

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	CHAPTER 11
FIELDWOOD ENERGY LLC, <i>et al.</i> ,	§	
	§	CASE NO. 20-33948 (MI)
Debtors. ¹	§	
	§	(Jointly Administered)

STIPULATION REGARDING RESPONSE DEADLINE TO FEE APPLICATIONS

This *Stipulation Regarding Response Deadline to Fee Applications* (the “Stipulation”) is entered into by and among David M. Dunn, Plan Administrator (the “Plan Administrator”) in the above-captioned case; Cole Schotz P.C. (“Cole Schotz”); Pachulski Stang Ziehl & Jones LLP (“PSZJ”); Stroock & Stroock & Lavan LLP (“Stroock”); Mani Little & Wortmann, PLLC (“MLW”); AlixPartners, LLP (“AlixPartners”); Houlihan Lokey Capital, Inc. (“Houlihan Lokey”); Jones Walker LLP (“Jones Walker”); and Ryan, LLC (“Ryan” and, together with Cole Schotz, PSZJ, Stroock, MLW, Alix Partners, Houlihan, and Jones Walker, the “Professionals”), by and through their respective counsel, if any, with reference to the following facts:²

WHEREAS, on October 11, 2021, Cole Schotz filed its *Final Fee Application of Cole Schotz P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Official*

¹ The debtors in these chapter 11 cases and the last four digits of each Debtor’s federal tax identification numbers, as applicable, are as follows: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Collectively, the Plan Administrator and the Professionals will be referred to herein as the “Parties”.

Committee of Unsecured Creditors for the Period from August 20, 2020 through March 31, 2021 [Dkt. 2083] (the “Cole Schotz Fee Application”);

WHEREAS, on October 11, 2021, PSZJ filed its *Second Interim and Final Fee Application of Pachulski Stang Ziehl & Jones LLP for Allowance of Compensation for Services Rendered as Co-Counsel to the Official Committee of Unsecured Creditors for the Period from January 20, 2021 through August 27, 2021* [Dkt. 2084] (the “PSZJ Fee Application”);

WHEREAS, on October 11, 2021, Stroock filed its *Fourth and Final Fee Application of Stroock & Stroock & Lavan LLP, as Counsel to the Official Committee of Unsecured Creditors of Fieldwood Energy LLC, et al., for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred During (I) the Interim Period from May 1, 2021 through and including August 27, 2021, and (II) the Final Application Period of August 19, 2020 through and including August 27, 2021* [Dkt. 2085] (the “Stroock Fee Application”);

WHEREAS, on October 11, 2021, MLW filed its *Second Interim and Final Fee Application of Mani Little & Wortmann, PLLC, for Allowance of Compensation for Services Rendered as Special Counsel to the Official Committee of Unsecured Creditors of Fieldwood Energy, LLC et al., for the Period From October 21, 2020 through and including March 1, 2021* [Dkt. 2086] (the “MLW Fee Application”);

WHEREAS, on October 12, 2021, AlixPartners filed its *Joint (I) Fourth Interim Fee Application for the Period May 1, 2021 through August 27, 2021 and (II) Final Fee Application for the Period August 3, 2020 through August 27, 2021 for the Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incured as Financial Advisor to the Chapter 11 Debtors* [Dkt. 2087] (the “AlixPartners Fee Application”);

WHEREAS, on October 12, 2021, Houlihan Lokey filed its *Fourth Interim and Final Fee*

Application of Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker to the Debtors for Allowance of (I) Compensation for Services Rendered and Reimbursement of Out-of-Pocket Expenses Incurred for (A) the Fourth Interim Period of the Period of May 1, 2021 through August 27, 2021 and (B) the Final Compensation Period of August 3, 2020 through August 27, 2021, (II) Compensation Related to the Exit Financings, and (III) the Restructuring Transaction Fee [Dkt. 2088] (the “Houlihan Lokey Fee Application”);

WHEREAS, on October 12, 2021, Jones Walker filed its *Fourth and Final Fee Application of Jones Walker LLP for Allowance and Payment of Fees and Expenses as Special Counsel for Debtors for the Period May 1, 2021 through August 27, 2021* [Dkt. 2089] (the “Jones Walker Fee Application”);

WHEREAS, on October 12, 2021, Ryan filed its *Final Fee Application of Ryan, LLC for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred Postpetition* [Dkt. 2091] (the “Ryan Fee Application” and, together with the Cole Schotz Fee Application, the PSZJ Fee Application, the Stroock Fee Application, the MLW Fee Application, the AlixPartners Fee Application, the Houlihan Fee Application, and the Jones Walker Fee Application, the “Fee Applications”, and each a “Fee Application”);

WHEREAS, each of the Fee Applications states that the deadline to response to such Fee Application is fourteen (14) days from the date the Fee Application was either filed or served;

WHEREAS, pursuant to Local Bankruptcy Rule 9013-1(b), the correct deadline to respond to each Fee Application is twenty-one (21) days from the date upon which each Professional served its Fee Application;

WHEREAS, the Parties have agreed, subject to approval of this Court, to stipulate that the deadline to file and serve any response to a Fee Application is twenty-one (21) days from the

date upon which such Fee Application was served;

NOW, THEREFORE, IT IS STIPULATED AND AGREED TO BY THE PARTIES, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:

1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereinafter.
2. The deadline for any party-in-interest, including the Plan Administrator, to file and serve any response to any of the Fee Applications is twenty-one (21) days from the date upon which such Fee Application was served.

Dated:

Honorable Marvin Isgur
United States Bankruptcy Judge

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day
and year first below written.

Dated: October 25, 2021

MINTZ LEVIN COHN FERRIS GLOVSKY AND
POPEO, P.C.

/s/Joseph R. Dunn

By: Joseph R. Dunn (*Pro Hac Vice*)
CA State Bar No. 238069
jrdunn@mintz.com
3580 Carmel Mountain Rd.
Suite 300
San Diego, California 93210
T: (858) 314-1500
F: (858) 314-1501

-and-

Abigail V. O'Brient (*Pro Hac Vice*)
CA State Bar No. 265704
aobrient@mintz.com
2029 Century Park East
Suite 3100
Los Angeles, California 90067
T: (310) 586-3200
F: (310) 586-3202

Counsel for David Dunn, as Plan Administrator

Dated: October 25, 2021

COLE SCHOTZ P.C.

/s/James W. Walker

By: James W. Walker
Texas Bar No. 20709600
901 Main Street
Suite 4120
Dallas, TX 75202
T: (469) 557-9391
F: (496) 557-0361
Email: jwalker@coleschotz.com

-and-

Daniel F.X. Geoghan
1325 Avenue of the Americas
19th Floor
New York, NY 10019
T: (646) 563-8925
F: (646) 563-7925
Email: dgeoghan@coleschotz.com

Dated: October 25, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/Benjamin L. Wallen

By: Michael D. Warner
TX State Bar No. 00792304
Benjamin L. Wallen
TX State Bar No. 24102623
440 Louisiana Street
Suite 900
Houston, TX 77002
T: (713) 691-9385
F: (713) 691-9407
Email: mwarner@pszjlaw.com
bwallen@pszjlaw.com

Dated: October 25, 2021

STROOCK & STROOCK & LAVAN LLP

/s/Kenneth Pasquale

By: Kenneth Pasquale (*Pro Hac Vice*)
180 Maiden Lane
New York, NY 10038-4982
T: (212) 806-5562
F: (212) 806-6006
Email: kpasquale@stroock.com

Dated: October 25, 2021

MANI, LITTLE & WORTMANN, PLLC

/s/Eric W. Wortmann

By: Eric W. Wortmann
TX State Bar No. 24047477
300 Austin Highway
Suite 150
San Antonio, TX 78209
T: (210) 403-9461
F: (210) 403-9264
Email: ewortmann@mlwenergylaw.com

Dated: October 25, 2021

ALIXPARTNERS, LLP

/s/Robert D. Albergotti

By: Robert D. Albergotti
Managing Director
1221 McKinney Street
Suite 3275
Houston, TX 77010
T: (713) 276-4900
F: (713) 276-4901
Email: ralbergotti@alixpartners.com

Dated: October 25, 2021

HOULIHAN LOKEY CAPITAL, INC.

/s/John-Paul Hanson

By: John-Paul Hanson
Managing Director
1001 Fannin St.
Suite 4650
Houston, TX 77002
T: (832) 319-5150
F: (832) 319-5151
Email: jhanson@hl.com

Dated: October 25, 2021

JONES WALKER LLP

/s/James Noe

By: James Noe
Texas Bar No. 24040178
811 Main Street
Suite 2900
Houston, TX 77002
T: (713) 437-1800
F: (713) 437-1801
Email: jnoe@joneswalker.com

-and-

Mark A. Mintz
SDTX No. 1140193
201 St. Charles Avenue
49th Floor
New Orleans, LA 70170
T: (504) 582-8368
F: (504) 589-8368
Email: mmintz@joneswalker.com

Dated: October 26, 2021

BELL NUNNALLY & MARTIN LLP

/s/Heather H. Jobe

By: Heather H. Jobe
Texas Bar No. 24048825
Troy Hales
Texas Bar No. 24099011
2323 Ross Ave.
Suite 1900
Dallas, TX 75201
T: (214) 740-1462
F: (214) 740-1499
Email: hjobe@bellnunnally.com
thales@bellnunnally.com

Counsel for Ryan, LLC